

Attachment 13

LS-AA-125-1001
Revision 5

Root Cause Investigation Charter (rev 1)

Tritium Release from Braidwood Station with a Potential to Affect the Public

Condition Report #: 428868

Sponsoring Manager: Janice Kuczynski, Chemistry Manager

Team Investigator(s):

<u>Names</u>	<u>Position</u>	<u>Commitment</u>
Jason Eggart	Braidwood Chemistry Lead Investigator	Full Time
Tom Leffler	Root Cause Qualified Investigator	Full Time
Randy Kalb	Dresden Chemistry Investigator	Part Time
Kim Aleshire	Braidwood EP (ODCM) Investigator	Full Time
Glen Vickers	LaSalle RP Investigator	Full Time
Scott Kirkland	Quad Cities Investigator	Part Time
Jim Crawford	Braidwood Maintenance Investigator	Full Time
John Gumnick	Corporate RP (CHP) Investigator	Part-Time
Mike Miller	Braidwood Operations	Part Time
Jeff Burkett	Braidwood Operations	Part Time
Dan Stroh	Braidwood Engineering	Full-Time
Scott Sklenar	Hydrologist	Part-Time

Scope:

The scope of the root cause investigation is twofold:

The first focus of this root cause team is to determine the root cause(s) of the Tritium releases from Braidwood Station with a potential to affect the public. This causal determination should include the large volume leaks which occurred in 1998 and in 2000 as well as the smaller volume leaks which both followed and preceded the 1998 and 2000 leaks. The responsibility for identifying and

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operationalizing corrective actions to prevent future unacceptable tritium releases to the environment is being addressed by the Braidwood Tritium Remediation Team under AR 435383. This root cause team remains responsible for identifying corrective actions to address organizational weaknesses contributing to or causing the releases described above.

The second focus of this root cause team is to evaluate the effectiveness of Braidwood's response to the circulating water Blowdown leaks which deposited tritiated water on the ground during 1998 and 2000 as well as during the smaller volume leaks which both followed and preceded the 1998 and 2000 leaks. If this evaluation determines that Braidwood's response actions were not effective, this root cause team will determine the root cause and appropriate corrective actions for those ineffective response actions. The investigation will review response procedures, regulations, environmental impacts, and managerial effectiveness. As part of this second focus item, the team will review the response to known spills in 1998, 2000 and similar IRs. A review of year 2000 Root Cause corrective action effectiveness will be performed. Specifically, the team will look for any evidence that the actions to prevent recurrence were not effective. An E&CF Chart will be utilized for Change Analysis and Barrier Analysis. Tap Root Analyses will also be utilized. To accomplish a timely report delivery, support will be required as noted above in Engineering, Hydrology, Maintenance, Operations, Off-Site Dose Assessment, and Technical Writing.

The responsibility for remediating the existing condition of detectable tritium in groundwater on and in the vicinity of Braidwood Station is not the responsibility of this root cause team. Remediation of the existing condition of detectable tritium in groundwater on and in the vicinity of Braidwood Station is being addressed by the Braidwood Tritium Remediation Team under AR 435383.

Interim Corrective Actions:

As described above, an Issues Management Team (the Braidwood Tritium Remediation Team) has been formed to manage the recovery. Additional Sampling is being performed and analyzed to fully define the affected areas.

The discharge piping is being reviewed for integrity.

Remediation plans will be developed and implementation initiated.

The Braidwood Tritium Remediation Team will maintain communications with Exelon, Regulatory personnel, the public, and INPO.

Root Cause Report Milestones:

1. Event Date (11/30/05)
2. Screening Date (12/07/05)

ab
VB 4-17?
leaks

Tras Bury
(West side)
cont?

3. Completion of Charter (2 Days from MRC) [-03] (12/09/05)
- 3a. Completion of Charter revision (02/08/06)
4. Status Briefing for Charter [-14] (12/14/05)
5. Two Week Update & Draft RCR for Reviews [-07] (12/21/05)
6. MRC Update & Draft RCR for Reviews [-08] (12/28/05)
7. CAPCo Reviews of RCR [-15] (12/29/05)
8. Collegial Reviews of RCR [-15] (12/29/05)
9. MRC Update & Draft RCR for Reviews [-09] (01/04/06)
10. Sponsoring Manager Report Approval [-14] (01/04/06)
11. Root Cause delivered to PORC (01/24/06)
12. Review by PORC [-05] (01/26/06)
13. Revised Root Cause Report delivered to PORC (02/14/06)
14. Revised Root Cause Report Reviewed by PORC (02/17/06)
13. Final Root Cause Investigation Due Date [-04] (02/20/06)

Prepared By: Tom Leffler, Root Cause Qualified Investigator

(Name)

02/06/06

(Date)

Approved By: Carl B. Dunn, Training Director

For (Sponsoring Manager)

02/08/06

(Date)